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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ2986

BY: *Op*

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Sharon GONZALEZ-Vasquez,

Defendant.

) Mag. Case No.

) COMPLAINT FOR VIOLATION OF:

) Title 8, U.S.C., Section 1324

) (a)(2)(B)(iii) -Bringing In Illegal Alien(s)

) Without Presentation

The undersigned complainant, being duly sworn, states:

On or about December 25, 2007, within the Southern District of California, defendant Sharon GONZALEZ-Vasquez, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, Jessica ALCANTE-Medrano and Martha REYES-Montes, had not received prior official authorization to come to, enter and remain in the United States, did bring to the United States said aliens and upon arrival did not bring and present said aliens immediately to an appropriate immigration officer at designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(A)(iii).

And the complainant states that this complaint is based on the attached statement of facts which, is incorporated herein by reference.

*[Signature]*  
Senior Border Patrol Agent

SWORN TO BEFORE AND SUBSCRIBED IN MY PRESENCE THIS 27th DAY OF  
DECEMBER 2007.

*[Signature]*  
United States Magistrate Judge

1 UNITED STATES OF AMERICA

2 v.

3 Sharon GONZALEZ-Vasquez

4 STATEMENT OF FACTS

5 The complainant states that this complaint is based upon statements in the investigative  
6 reports by the apprehending officers, Border Patrol Agent M Ramos and A. Luzbert that on  
7 December 25, 2007, the defendant, a United States citizen of was apprehended near Calexico,  
8 California, as the foot guide, as she smuggled (2) two undocumented aliens from Mexico across  
9 the border fence near Calexico, California in violation of law.

10 The Remote Video Surveillance Systems Operator observed as four suspected illegal  
11 aliens climbed over the Mexico/United States International border fence, one subject went back  
12 into Mexico and the other three suspected illegal aliens ran into a truck lot located on Imperial  
13 Avenue and Second Street. Agent Ramos responded to the area and searched for the three  
14 individuals where the RVSS operator last had visual.

15 Agent Luzbert also responded to the area and upon entering the truck lot, he observed an  
16 individual walking out. Agent Luzbert identified himself as a United States Border Patrol Agent  
17 to the subject, who was later identified as Sharon GONZALEZ-Vasquez. After a brief search,  
18 Agent Ramos found two individuals attempting to conceal themselves under a truck. Agent  
19 Ramos identified himself as a United States Border Patrol Agent and questioned the two subjects  
20 as to their citizenship. Both subjects admitted to being citizens of Mexico without any  
21 documents to be in or reside in the United States. After further questioning both subjects  
22 revealed that they had just made an illegal entry into the United States. Agent Ramos found  
23 another set of foot prints near the other two subjects. Agent Ramos followed the foot prints,  
24 which let to the entrance of the truck lot. Agent Ramos notified Agent Luzbert regarding his  
25 findings. Agent Luzbert checked GONZALEZ' foot prints and noticed that they were the same  
26 foot prints as the ones Agent Ramos had described to him. Agent Luzbert questioned  
27 GONZALEZ regarding their findings. GONZALEZ admitted to have made an illegal entry with  
28 the other two subjects. GONZALEZ also admitted to guiding the two subjects. GONZALEZ  
29

also stated that she was going to guide the subjects to the Filco Gas Station in Calexico, California.

All the subjects were transported to the El Centro Station for further processing.

At the approximately 0950 hours GONZALEZ was advised of her Miranda Rights by Agent M. Mireles and was witnessed by Agent K. Wong. GONZALEZ stated that she understood her rights and waived his right to have an attorney present during questioning.

GONZALEZ stated that an acquaintance asked her to smuggle two females into the United States. GONZALEZ also stated that she was going to receive \$200.00 for each smuggled alien. Upon arriving to the Filco Gas Station, located on Imperial Avenue and Third Street, in Calexico, California, GONZALEZ was instructed to call someone else for pick up.

Material witnesses Jessica ALCANTE-Medrano and Martha REYES-Montes stated they are citizens of Mexico illegally in the United States. REYES stated her husband made arrangement for her to be smuggled into the United States then to be transported to Oregon for an unknown fee. REYES also stated her husband made arrangements with an unknown smuggler for her to be smuggled into the United States. REYES stated that she was going to reside at an unknown location with her uncle until her husband could come down from Oregon to pick her up. Both ALCANTE and REYES were shown a six pack photo line up. ALCANTE and REYES positively identified GONZALEZ as the foot guide that climbed with them over the International Boundary Fence and instructed them to follow her into the United States.

The complainant states that the names of the Material Witnesses are as follows:

<u>NAME</u>	<u>PLACE OF BIRTH</u>
Jessica ALCANTE-Medrano	Mexico
Martha REYES-Montes	Mexico

Further, complainant states that Jessica ALCANTE-Medrano and Martha REYES-Montes, are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal

1 charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section  
2 3144.